

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
Vs.	)	Case No. 4:14CR152RWS/NCC
	)	
GREG SLOAN,	)	
	)	
Defendant.	)	

**DEFENDANT GREG SLOAN'S MOTION TO MODIFY CONDITIONS OF RELEASE  
TO ALLOW SINGLE INSTANCE OF TRAVEL**

Comes now Defendant Greg Sloan, by and through his attorney Matthew T. Schelp, and hereby files a motion to modify the conditions of his release to allow travel. In support thereof, Defendant states as follows:

1. Defendant Greg Sloan is charged by way of indictment with conspiracy to distribute substance analogues.

2. On June 26, 2014, this Court ordered the release of Mr. Sloan upon a \$50,000 USD bond, secured with a 10% cash deposit of \$5,000 USD. The Court imposed electronic monitoring by global positioning system tracking, and Mr. Sloan is not to leave the Eastern District of Missouri unless given written permission outside this district by the U.S. Pretrial Services Agency. Doc. 130.

3. Mr. Sloan requests that this Court modify his conditions of release to allow for travel to Springfield, Missouri and McKinney, Texas on Thursday, October 8, 2015 through Monday, October 12, 2015. The purpose of this travel is to spend time with Defendant's family, specifically to drive with and attend his son's baseball tournament, as well as to return his son to Springfield, Missouri where he attends school.

4. The addresses where Defendant will stay during this trip are 1610 E. Evergreen St., Springfield, MO 65803 and 6501 Henneman Way, McKinney, Texas 75070, both of which are La Quinta Inn locations in Springfield, MO and McKinney, TX, respectively.

5. Counsel for Mr. Sloan has spoken with and obtained the consent and agreement of the Assistant United States Attorneys as well as Pretrial Services for the limited modification Defendant seeks.

WHEREFORE, for the foregoing reasons Defendant Greg Sloan, by and through his counsel, respectfully requests this Court enter an order consistent with the instant motion allowing Greg Sloan to conduct this limited travel.

Respectfully submitted,

HUSCH BLACKWELL LLP

/s/ Matthew T. Schelp

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*Attorney for Defendant Greg Sloan*

#### **CERTIFICATE OF SERVICE**

I hereby certify that on September 18, 2015, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon all attorneys of record.

/s/ Matthew T. Schelp

Matthew T. Schelp, #45724MO